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11 *Attorneys for Non-Party*
12 *Netflix, Inc.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA,**
15 **SAN FRANCISCO DIVISION**

16 LYNWOOD INVESTMENTS CY LIMITED,
17 Plaintiff,

18 v.

19 MAXIM KONOVALOV, IGOR SYSOEV,
ANDREY ALEXEEV, MAXIM DOUNIN, GLEB
SMIRNOFF, ANGUS ROBERTSON, NGINX,
20 INC. (BVI), NGINX SOFTWARE, INC., NGINX,
INC. (DE), BV NGINX, LLC, RUNA CAPITAL,
21 Inc., EVENTURE CAPITAL PARTNERS II, LLC
and F5 NETWORKS, INC.,
22 Defendants.

Case No. 3:20-cv-03778-MMC (KAW)

**JOINT STIPULATION EXTENDING
TIME TO OPPOSE LYNWOOD'S
MOTION TO COMPEL AND FOR
LYNWOOD TO REPLY TO
NETFLIX'S OPPOSITION
PURSUANT TO CIVIL L.R. 6-1(b)**

Judge: Hon. Kandis A. Westmore
Date: October 16, 2025
Time: 1:30 P.M.

1 Pursuant to Civil Local Rule 6-1(b), Plaintiff Lynwood Investments CY Limited
2 (“Lynwood”) and Non-Party Netflix, Inc. (“Netflix”) by and through their undersigned counsel,
3 hereby agree and stipulate to the following:

4 WHEREAS, On June 10, 2025 Lynwood served a Subpoena for the Production of
5 Documents (the “Subpoena”) on Netflix;

6 WHEREAS, On August 29, 2025 Lynwood filed a motion to compel Netflix to produce
7 information pursuant to the Subpoena (ECF No. 228);

8 WHEREAS, Per Civil Local Rule 7-3(a), Netflix’s deadline to file an opposition to
9 Lynwood’s motion to compel is September 12, 2025, and Per Civil Local Rule 7-3(c) Lynwood’s
10 deadline to file a reply to Netflix’s opposition is September 19, 2025;

11 WHEREAS, On August 29, 2025 the Court referred Lynwood’s motion to a Magistrate
12 Judge (ECF No. 231);

13 WHEREAS, on September 4, 2025 Lynwood’s motion to compel was assigned to the
14 Honorable Kandis A. Westmore;

15 WHEREAS, on September 4 Judge Westmore set the hearing on Lynwood’s motion to
16 compel for October 16, 2025 and ordered that the “briefing schedule remains in effect” (ECF No.
17 232);

18 WHEREAS, counsel for Netflix is traveling internationally during the week of September
19 8, and has multiple depositions and hearings scheduled during that time;

20 WHEREAS, counsel for Lynwood and counsel for Netflix have agreed to a mutual one-
21 week extension of the briefing schedule for the opposition and reply to Lynwood’s motion to
22 compel, such that Netflix’s opposition would be due September 19, 2025 and Lynwood’s reply
23 would be due on September 26, 2025;

24 WHEREAS, this extension will not require the court to alter its scheduled October 16,
25 2025 hearing date for Lynwood’s motion to compel, or any other deadline already fixed by Court
26 order;

27 WHEREAS, this is the first extension sought by Lynwood and Netflix;
28

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
2 the undersigned counsel for Lynwood and Netflix, that the deadline for Netflix's opposition to
3 Lynwood's motion to compel is extended to September 19, 2025 and the deadline for Lynwood's
4 reply to Netflix's opposition is extended to September 26, 2025.

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6
7 Dated: September 10, 2025

Respectfully submitted,

8
9 /s/ Taylor Gooch

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21 *Attorneys for Non-Party*
22 *Netflix, Inc.*

23
24 Dated: September 10, 2025

25 /s/ Christopher J. Major

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14 *Attorneys for Plaintiff*
15 *Lynwood Investments CY Limited*

16 **IT IS SO ORDERED.**

17 Dated: _____

18 _____
19 Hon. Kandis A. Westmore
20 United States Magistrate Judge
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FILER'S ATTESTATION

I, Taylor Gooch, am the ECF user whose identification and password are being used to file the parties Stipulation Extending Time To Oppose Lynwood's Motion to Compel and For Lynwood to Reply to Netflix's Opposition. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

/s/ Taylor Gooch

Joseph Taylor Gooch